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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

DALI WIRELESS, INC.,  
Plaintiff,

v.

CORNING OPTICAL COMMUNICATIONS  
LLC,  
Defendant.

Case No: 3:20-cv-06469-EMC

**DALI WIRELESS, INC.'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED**

Pursuant to Civil Local Rules 7-11(a) and 79-5(f), Plaintiff Dali Wireless, Inc. (“Dali”) respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed in connection with Dali’s Opposition to Defendant’s Renewed Motion and Motion for Judgment on the Pleadings of No Willful Infringement (“Dali’s Opposition”).

Certain portions of Dali’s Opposition and certain documents filed as exhibits to the Szpajda Decl.<sup>1</sup> in support thereof contain information that Defendant Corning Optical Communications, LLC (“Corning”) has designated CONFIDENTIAL or CONFIDENTIAL ATTORNEY EYES ONLY pursuant to the parties’ Stipulated Protective Order (“Protective Order”) entered by this Court on November 10, 2021, ECF No. 63. Accordingly, Dali seeks to file under seal the documents and information as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Dali’s Opposition	Highlighted in yellow	Corning
Exhibit B to Szpajda Decl.	Entire document	Corning
Exhibit F to Szpajda Decl.	Entire document	Corning
Exhibit G to Szpajda Decl.	Entire document	Corning
Exhibit H to Szpajda Decl.	Entire document	Corning
Exhibit M to Szpajda Decl.	Entire document	Corning
Exhibit N to Szpajda Decl.	Entire document	Corning
Exhibit O to Szpajda Decl.	Entire document	Corning
Exhibit S to Szpajda Decl.	Entire document	Corning
Exhibit T to Szpajda Decl.	Entire document	Corning
Exhibit U to Szpajda Decl.	Entire document	Corning

Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by another party or

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<sup>1</sup> “Szpajda Decl.” refers to the Declaration of Stefan Szpajda In Support of Dali Wireless Inc.’s Opposition to Corning’s Motion for Judgment on the Pleadings of No Willful Infringement, filed concurrently herewith.

non-party.” L.R. 79-5(f). Dali has redacted the yellow-highlighted portions of its Opposition under seal only because Corning has designated the information contained therein CONFIDENTIAL and/or CONFIDENTIAL ATTORNEY EYES ONLY under the Stipulated Protective Order. Additionally, the exhibits to the Szpajda Decl. listed above were designated by Corning as containing CONFIDENTIAL and/or CONFIDENTIAL ATTORNEY EYES ONLY information under the Stipulated Protective Order. Dali takes no position on the merits of sealing Corning’s designated material and expects Corning to file one or more declarations in accordance with Local Rule 79-5(f)(3).

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. In accordance with Local Rule 79-5(c)(3), Dali has also filed a Proposed Order herewith.

Dated: March 9, 2022

/s/ Stefan Szpajda

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